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6 Attorney for Creditor, Rest Your Case Evidence Storage LLC  
7  
8

9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA—LOS ANGELES DIVISION

11 In re: Girardi Keese,  
12 Debtor

CASE NO.: 2:20-bk-21022-BR  
Assigned to: Hon. Barry Russell  
Dept. 1668

13 Notice of Motion and Motion to ORDER  
14 Disposition of Stored Wrecked Vehicles Sold  
15 for Scrap With RYC Keeping the Minimal  
16 Proceeds Therefrom OR To Order Trustee to  
17 Identify Any Attorney/Law Firm Handling The  
18 Cases Associated With the Vehicles;  
19 Memorandum of Points and Authorities;  
20 Declaration of Pauline White; Declaration of  
21 Dave Galassi

Petition filed: 12-18-20

Date: September 27, 2022  
Time: 10:00 a.m.

22  
23 To The Court, Trustee, And All Creditors:

24 Please take notice that Creditor Rest Your Case Evidence Storage LLC ("RYC") will  
25 appear, if there is opposition, on September 27, 2022 at 10:00 a.m. in Department 1668 of the  
26 Court at the Roybal Federal Courthouse, 255 E. Temple Street, Los Angeles, California  
27 seeking one of the following orders:  
28

1 (1) An Order that the four (4) wrecked vehicles identified below and in the  
2 Declaration of Dave Galassi, stored by Girardi Keese with RYC, be sold for scrap metal, with  
3 RYC to keep the minimal proceeds, which are estimated to be less than \$1,000.00 total:

4 2006 Toyota Corolla

5 2001 Kia Sedona

6 2015 MB S550

7 2017 VW Jetta

8  
9 It is believed that these vehicles are / were owned by Girardi Keese clients, not Girardi Keese,  
10 who merely stored the vehicles to prove, or disprove, some issue in a claim and/or lawsuit in  
11 which Girardi Keese's client was involved.

12  
13 It is also possible that any claim/case associated with these vehicles has already  
14 settled or resolved and Girardi Keese, the Trustee, or any subsequent attorney failed to notify  
15 RYC that storage is no longer required. Thus, continued storage MAY not be required, but  
16 RYC has no way of knowing.

17 OR

18 (2) Alternatively, RYC asks the Court to ORDER the Trustee to identify any attorney  
19 and/or law firm who is handling any claim/case associated with the above wrecked vehicles, so  
20 that RYC can contact the attorney or firm to see if storage is still required and to send storage  
21 bills to that person or law firm.

22  
23 This motion is based on the Bankruptcy Court's ability to control the estate of a debtor  
24 and its equitable powers, as well as statutes and rules such as 11 U.S.C. § 362, 11 USC §  
25 541(a)(3), 11 USC § 542(a); 11 USC § 543(a), 11 USC § 554(a), (b), 11 USC § 1107; 28 USC  
26 § 1334(e)(1), FRBP 6007B, LBR 4001-1, LBR 6004-1, LBR 9013-1, LBR 9021-1, FRBP 9013-  
27 1, and FRBP 9014, and case law.  
28

1 It is not believed that the Trustee or any creditor will object to this motion, as these four  
2 vehicles are wrecked and have only scrap value estimated to be less than \$1,000.00 in total.

3 Notice is given to the Debtor and Trustee and any Responding Parties, their attorneys  
4 (if any), and other interested parties that on the date and time and in the courtroom stated  
5 above, Movant will request that this court enter an order granting relief as listed herein, on the  
6 grounds set forth in the attached Motion.  
7

8 To any party or person associated with this claim: Take notice---your rights may be  
9 affected. You should read these papers carefully and discuss them with your attorney, if you  
10 have one. (If you do not have an attorney, you may wish to consult one.)

11 Deadline for Opposition Papers: This Motion is being heard on regular notice pursuant  
12 to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the  
13 court and serve a copy of it upon the Movant's attorney at the address set forth above, the  
14 U.S. Trustee, if any, and all creditors and other parties in interest entitled to notice, no less  
15 than fourteen (14) days prior to the above hearing date, plus 3 additional days if you were  
16 served by mail or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F). If you fail to file a written response  
17 to this Motion within such time period, the court may treat such failure as a waiver of your right  
18 to oppose the Motion and may grant the requested relief.  
19  
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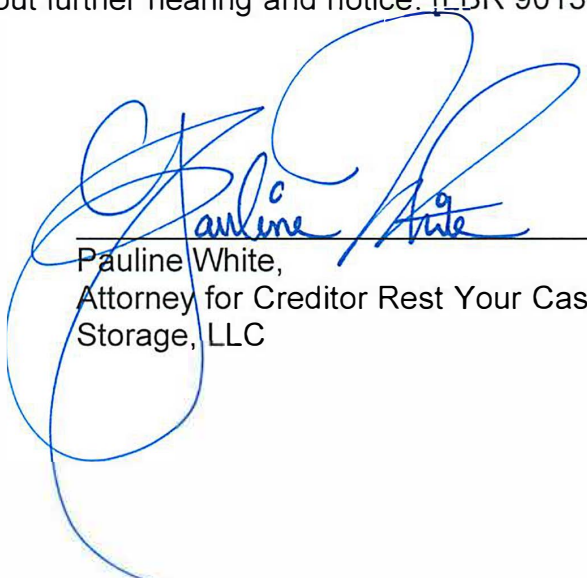
21 To file a response to the motion, you may be able to obtain an approved court form at  
22 [www.cacb.uscourts.gov/forms](http://www.cacb.uscourts.gov/forms) for use in preparing your response, or you may prepare your  
23 response using the format required by Bankruptcy Court rules and the Court Manual.

24 Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure: The  
25 undersigned hereby verifies that the above hearing date and time were available for this type  
26 of Motion according to the judge's self-calendaring procedures.  
27  
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1 Movant is requesting that the court grant the Motion without a hearing as provided for in  
2 LBR 9013-1(o), unless a party in interest timely files and serves a written opposition to the  
3 Motion and requests a hearing.

4 If anyone fails to comply with this deadline: (1) Movant will file a declaration to indicate:  
5 (1) the Motion was properly served, (2) the response period elapsed, and (3) no party filed and  
6 served a written opposition and request for a hearing within 14 days after the date of service of  
7 the notice [LBR 9013-1(o)(3)]; (2) Movant will lodge an order that the court may use to grant  
8 the Motion; and (3) The court may treat a failure to oppose as a waiver of any right to oppose  
9 the Motion and may grant the Motion without further hearing and notice. [LBR 9013-1(h)]  
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11 Dated: August 25, 2022

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15 Pauline White,  
16 Attorney for Creditor Rest Your Case Evidence  
17 Storage, LLC  
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**Summary:**

Movant / Creditor Rest Your Case Evidence Storage LLC ("RYC") is storing four (4) wrecked vehicles which are, or were, associated with claims and/or cases handled by Girardi Keese. It is not known if these vehicles still NEED to be stored.

The vehicles are stored at Rest Your Case Evidence Storage LLC, 6364 Irwindale Avenue, Irwindale, CA.

A bankruptcy action was filed against Girardi Keese under Chapter 7 on December 18, 2020. At the time bankruptcy was filed, Girardi Keese owed RYC large sums for transport and storage fees and had multiple pieces of evidence stored at RYC.

It is not believed that any stay affects these vehicles, but if it does, any stay should be lifted under 11 U.S.C. § 362 because: it is believed the vehicles were owned by Girardi Keese clients, not Girardi Keese; the vehicles are/were somehow associated with claims/litigation in which Girardi Keese was involved which may, or may not, still be pending; the vehicles are wrecked and have metal scrap value only, estimated to be less than \$1,000.00 in total; the only real value of these wrecked vehicles is as evidence in litigation; without the help of this Court, RYC cannot locate any attorney or law firm now handling the claim or case associated with these vehicles; and storage is not being paid on these four wrecked vehicles but they are taking up space which RYC could use for paying customers.

**Memorandum of Points and Authorities**

**Factual Background:**

RYC is in the business of storing evidence that companies, insurers, individuals, and/or law firms may need to in order to pursue or defend claims and/or litigation.

1 RYC will travel to police tow yards, homes, accident locations, etc. to pick up evidence.  
2 Often RYC has to front fees to the tow lot just to obtain possession of a vehicle. Wrecked  
3 vehicles must often be wrapped before transport, given their bad condition, to keep all parts  
4 intact and then loaded on flatbed tows, and driven to a RYC lot. Requests for pickups can  
5 occur 24 hours a day; in good weather and bad. RYC drivers must often wait at tow yards for  
6 paperwork to be approved and access to the yard to obtain the vehicle. These vehicles have  
7 to be loaded and unloaded with forklifts onto the flatbed tow. Upon arriving at RYC, the  
8 vehicles have to be logged and inventoried. RYC's expenses include advanced fees,  
9 wrapping, fuel, payment for drivers and helpers, office staff to log and bill, etc.  
10

11 When evidence is stored, there may not yet be litigation so there usually is no case  
12 number, or even identity of which court would have jurisdiction. Sometimes only one name of  
13 an individual or company is given when storage is requested; sometimes RYC is not given  
14 any name of an involved party. A client, such as Girardi Keese, may simply ask RYC to pick  
15 up a particular vehicle, from a particular place, with no other information given.  
16

17 As RYC is engaged only to store evidence, the details of the accident, the names of all  
18 parties and all attorneys or insurance companies, the venue, etc. is not important to them.  
19 Additionally, RYC is often contacted immediately after an accident, and attorneys may have  
20 not determined where to sue or who to sue, but realize the need to preserve evidence in case  
21 litigation becomes necessary within the two year statute of limitations. Many times, RYC  
22 stores evidence which is used by law firms and/or insurance companies who reach resolution  
23 without ever actually filing suit. Thus, it is impossible track down "cases" based upon the  
24 limited information RYC was given by Girardi Keese.  
25  
26

27 RYC identifies the stored item by client and its year, make, model, or any particular  
28 identifying information provided by the client. Example: Girardi Keese 2017 VW Jetta.

1 RYC is never told why any piece of evidence is stored.

2 Given the expense of transport and storage, only evidence for the larger damage  
3 accidents is usually stored with RYC.

4 RYC stores evidence for "plaintiff" law firms and "defense" law firms.

5 Girardi Keese was a "plaintiff" firm, suing on behalf of injured people, usually taking the  
6 larger injury cases. Girardi Keese, upon accepting representation of a client, would attempt to  
7 locate and preserve evidence, such as their client's vehicle. Sometimes Girardi Keese  
8 represented multiple people in an accident, and any name given to RYC, if any, may not have  
9 even been the vehicle owner.  
10

11 RYC bills the client (law firm, attorney, manufacturer, insurance company) every ninety  
12 (90) days for storage. Girardi Keese owed RYC significant amounts for the transport and  
13 storage of multiple pieces of evidence at the time the bankruptcy was filed.  
14

15 When Girardi Keese's bankruptcy was filed and the firm dissolved, RYC had no way to  
16 contact anyone at Girardi Keese to: (1) obtain payment of bills; (2) find out if storage was still  
17 required; (3) or to identify any attorney or law firm to whom the claim or case with which the  
18 stored evidence is associated was transferred.  
19

20 RYC has managed to track down new counsel for all pieces of evidence stored by  
21 Girardi Keese EXCEPT four (4) wrecked vehicles.

22 It is also possible that any claim or case associated with these four vehicles has already  
23 resolved through settlement or trial and the Girardi Keese firm, or the Trustee, or any new  
24 counsel taking over for Girardi Keese simply failed to notify RYC. If that is the case, RYC  
25 would have the right to dispose of the wreckage, sell the vehicles for scrap and offset the  
26 minimal amount received against storage charges.  
27

28 \\\

**Informal Attempts to Obtain Information:**

On March 26, 2021 counsel for RYC called the trustee Elissa D. Miller and the law firm representing her Smiley Wang-Ekval, then followed up with a letter asking if any of the claims associated with a list of evidence provided were still open, and if so, asking for the identity of the now-handling attorney. A true copy of the letter is attached as Exhibit A.

There was no response.

Counsel for RYC also attempted to check the registers of actions for all Southern California courts, state and federal, to attempt to locate any name associated with the evidence. RYC was given names like "Kelada v. Caltrans", no court information, no first name, no case number, no location of accident, no date of accident, or anything which could be used to track down a filed case. When a complaint was filed, "Kelada" may not have been the lead plaintiff name, nor "Caltrans" the lead defendant since Girardi Keese took catastrophic accident cases with multiple claimants/plaintiffs.

RYC's counsel spent a great deal of time attempting to research cases, attempting to locate any handling attorney, only to be completely frustrated. Charging for legal fees quickly adds to RYC's loss in that they are paying attorney fees on vehicles for which they are already owed storage costs.

Dave Galassi, who manages RYC, is in almost daily contact with attorneys and insurance companies. He has asked if anyone knows who got the cases associated with these vehicles, and has been unable to gather any information for four vehicles.

Thus, RYC remains stuck with four wrecked vehicles, which have no value, taking up space which could be used for paying clients, and which do not generate storage fees. RYC is earning no money from accrued storage charges. RYC does not know if the claims / cases associated with these wrecked vehicles are still on-going and whether these vehicles even



1 need to continue to be stored. RYC does not know what attorney / law firm is now handling  
2 such claims / cases, if they are still active.

3 RYC has no source for information about claims / cases associated with these four  
4 wrecked vehicles. RYC has no other option besides seeking the assistance of this Court to  
5 compel disposition of the vehicles OR to obtain identity of any attorney or law firm now  
6 handling any claim or case associated with the vehicles.  
7

8  
9 **The Wrecked Vehicles at RYC Have No Monetary Value:**

10 The four vehicles stored at RYC by Girardi Keese have been in major accidents. The  
11 damage is too extensive to allow repairs and the wrecked vehicles have no resale value, other  
12 than for scrap or salvage, which is estimated to be less than \$1,000.00 in total for all four.

13  
14 These vehicles have value only to a litigant hoping to prove, or disprove, a defect and/or  
15 liability for an accident.

16 The vehicles placed by Girardi Keese and still remaining at RYC are:

17 2006 Toyota Corolla

18 2001 Kia Sedona

19 2015 MB S550

20 2017 VW Jetta  
21

22 It is believed there are no lien-holders with any interest in these vehicles. Any lien  
23 holder is paid off by the insurance company providing coverage on the vehicle when  
24 settlement for property damage is made. Proposition 213 passed in 1996 was codified at  
25 California Civil Code §§ 3333.3 and 3333.4. It prohibited the recovery of non-economic  
26 damages if the motor vehicle operator was uninsured. Upon passage of Prop 213, most  
27 attorneys such as Girardi Keese who represented "plaintiffs" in personal injury litigation would  
28

1 not take a vehicular accident case if the operator of the vehicle was uninsured, since they  
2 would only be entitled to economic damages (ex. medical bills) and could not collect pain and  
3 suffering, which is where the big jury awards are made.

4 Thus, it can be said with legal certainty that these four wrecked vehicles are / were only  
5 owned by Girardi Keese clients, and any lender lien has been paid off by the insurance that  
6 existed on the vehicle.  
7

8  
9 **Prejudice to RYC:**

10 The four remaining Girardi-Keese stored vehicles take up limited storage space at RYC  
11 which could be used to store vehicles for paying firms.  
12

13 The loss of income, and the uncertainty as to whether RYC will receive payment from  
14 the Girardi Keese bankruptcy estate, and when any payment from the bankruptcy estate will  
15 be made, poses a financial hardship for RYC, a small business.  
16

17 **Automatic Stay Is Not Believed to Be Applicable Since Girardi Keese Did Not Own The**  
18 **Wrecked Vehicles:**

19 It is not believed the automatic stay applies, as RYC does not believe Girardi Keese  
20 owned the vehicles, or had any equity interest in them. (11 USC § 362(g)(1).) A law firm  
21 represents a client who owns the vehicle. Since Girardi Keese represented plaintiffs, the  
22 owners of these vehicles are/were most likely Girardi Keese clients who were suing another  
23 person or company and requested Girardi Keese preserve their vehicle to use as evidence.  
24

25 RYC believes Girardi Keese stored these vehicles in order to prove, or disprove, some  
26 issue in a claim or litigation to help their clients. RYC is never told the "reason" that any piece  
27 of evidence is stored by a client, as it does not matter to RYC.  
28

1 But, if the automatic stay does apply, RYC seeks release of the stay in order to sell the  
2 vehicles for scrap---assuming any attorney or law firm who took over the case or claim  
3 associated with these vehicles cannot be found, or the associated claim / case is no longer  
4 active. Since the estimated value, as scrap, is less than \$1,000.00 in total, and RYC does not  
5 believe Girardi Keese owned the vehicles, it would not seem this de minimus amount should  
6 be part of the Girardi Keese estate. (11 USC § 541(a).) This Court has the ability to determine  
7 what property is included in the bankruptcy estate. (In re Hafen (10<sup>th</sup> Cir. BAP 2020) 616 BR  
8 570, 578.) Since the wrecked vehicles have essentially no value, it is respectfully requested  
9 that they are not part of the Girardi Keese estate, and that RYC be allowed to keep any scrap  
10 metal sale proceeds to put toward unpaid storage on these wrecked vehicles. (United States  
11 v. Whiting Pools, Inc. (1983) 462 U.S. 198, 204-205.)  
12  
13

14 This Court may find that the four wrecked vehicles have “inconsequential value or  
15 benefit to the estate”. (11 USC § 541(a)(3), 543(a).)

16 This Court may find the four wrecked vehicles have been abandoned and should be  
17 excluded from the Girardi Keese estate, allowing RYC to scrap the wreckage. (11 USC §  
18 554(a), (b).)  
19

20 Continued storage of these wrecked vehicles may be considered burdensome to the  
21 estate and of inconsequential value and benefit to the estate. (11 USC § 554(a), (b) and 11  
22 USC § 1107; 11 USC § 542(a); FRBP 6007B; In re Hyman (9<sup>th</sup> Cir. BAP 1991) 123 BR 342,  
23 347.)  
24

25 This Court has the ability to allow destruction of these vehicles or provide the identity of  
26 any attorney or law firm now associated with the stored vehicles. (11 USC § 362(a), (d); 28  
27 USC § 1334(e)(1); Wayne Film Systems Corp. Film Recovery Systems Corp. (ND IL 1986) 64  
28 BR 45, 49.)

**Conclusion:**

RYC is storing four wrecked vehicles, having no monetary value, earning no storage fees, and has no way to determine if such vehicles are still needed for any case or claim. RYC has done everything possible to try to track down all the other pieces of evidence which Girardi Keese had stored at the RYC facility, but is unable to gather any information about four wrecked vehicles.

This Court's assistance is sought to either:

(1) allow disposition of these wrecked vehicles

2006 Toyota Corolla

2001 Kia Sedona

2015 MB S550

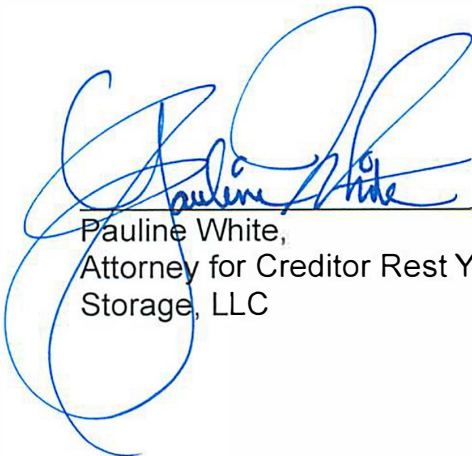
2017 VW Jetta

for scrap, to free up space at RYC, and allow RYC to keep the salvage value, estimated to be less than \$1,000.00 in total

**OR**

(2) to order the Trustee to provide the name of any attorney or law firm now handling the claim or case associated with these wrecked vehicles to RYC so RYC can ascertain if continued storage is required and send storage bills to that attorney or law firm.

Dated: August 25, 2022



Pauline White,  
Attorney for Creditor Rest Your Case Evidence  
Storage, LLC

**Declaration of Pauline White**

I, Pauline White, declare:

I make this declaration based on my own personal knowledge.

I represent Rest Your Case Evidence Storage LLC ("RYC"). RYC stores all sorts of evidence: wrecked cars, fire damaged appliances, construction scaffolding, etc. These pieces of evidence are used by attorneys in litigation to prove, or disprove, a legal issue. Given the charges to pick up items, and the storage charges, only evidence associated with the larger value cases is generally stored.

After learning of the Girardi Keese bankruptcy, I filed a claim on behalf of RYC, as Girardi Keese owed RYC a significant amount of money for transport and storage of multiple pieces of evidence prior to the bankruptcy being filed.

Neither RYC nor I were able to reach anyone at Girardi Keese to find out if any piece of evidence at RYC still needed to be stored, or what attorney or law firm the case/claim was being transferred to, or obtain any information whatsoever.

Dave Galassi has tracked down, or been contacted by new counsel, for most of the evidence which Girardi Keese stored at RYC. The remaining evidence stored at RYC by Girardi Keese, consists of four (4) wrecked vehicles: 2006 Toyota Corolla, 2001 Kia Sedona, 2015 MB S550, and 2017 VW Jetta.

RYC has been UNable to locate attorneys who are now handling cases taken over from Girardi Keese involving these four stored wrecked vehicles.

I attempted to locate any attorney or law firm handling a lawsuit associated with the Girardi Keese stored evidence, using the information given to RYC. Since RYC is often contacted shortly after an accident occurs, there may not be litigation yet, so party names are not known, which court the litigation will be filed in is not known, case numbers are not known,

1 opposing counsel are not known, insurers are not known, etc. RYC does not even get the full  
2 and correct names of people who owned the item of evidence: they usually go by client names  
3 and the year, make or model of the item, such as "Girardi Keese 2017 VW Jetta". RYC does  
4 not get police reports. Sometimes a name given to RYC by a law firm for their client is the  
5 passenger name, not the vehicle owner name.

6 I spent a great deal of time checking federal court files, Los Angeles County Superior  
7 Court files, Orange County Superior Court files, Ventura County Superior Court files, Riverside  
8 County Superior Court files, and San Bernardino County Superior Court files. However, since  
9 my client is not receiving storage fees for these wrecked vehicles, I do not wish RYC to incur  
10 legal fees in excess of anything RYC could possibly receive out of the bankruptcy estate.  
11

12 RYC has no remedy to either obtain information or permission to dispose of these  
13 wrecked vehicles, other than to file this motion.  
14

15 If the wrecked vehicles are still needed for on-going claims or litigation, RYC wants to  
16 preserve them and communicate with new counsel.

17 If the wrecked vehicles are no longer associated with any claim or case, then RYC  
18 would like to sell them for scrap, to free up space for paying customers, and put the salvage  
19 value toward past-due storage charges.  
20

21 I called the bankruptcy trustee Elissa Miller on March 25, 2021. I called the trustee's  
22 law firm of Smiley Wang-Ekval, Lei Lei Wang Ekvall, on March 25, 2021. I left detailed  
23 messages for each.

24 I had no return call.

25 I followed up with Ms. Miller and Smiley Wang-Ekval by letter dated March 26, 2021. A  
26 true copy of my letter is attached as Exhibit A.  
27

28 I had no response.

1 Since it is not believed that Girardi Keese owned the wrecked vehicles, I do not believe  
2 the automatic stay applies. Since the wrecked vehicles are too damaged to be repaired or  
3 used for anything other than scrap metal, I do not believe it benefits the Estate to continue to  
4 have RYC hold onto them.

5 Neither I nor RYC have any way to determine which attorney or law firm is now handling  
6 any claim or case associated with these four wrecked vehicles, or if any claim/case has  
7 already been settled and the vehicles should be disposed of. The trustee would, presumably,  
8 have records of what file was assigned to what attorney or law firm, and those files should  
9 indicate what vehicle was involved.  
10

11 It is also very likely that any claim or case associated with these four vehicles has  
12 settled and that Girardi Keese, the Trustee, or any subsequent attorney has failed to notify  
13 RYC that the vehicles are no longer needed.  
14

15 Therefore, I ask that this Court:

16 (1) Order the four (4) stored, wrecked vehicles identified below, stored by Girardi  
17 Keese with RYC, be sold for scrap metal, with RYC to keep the minimal proceeds, which are  
18 estimated to be less than \$1,000.00.  
19

20 2006 Toyota Corolla

21 2001 Kia Sedona

22 2015 MB S550

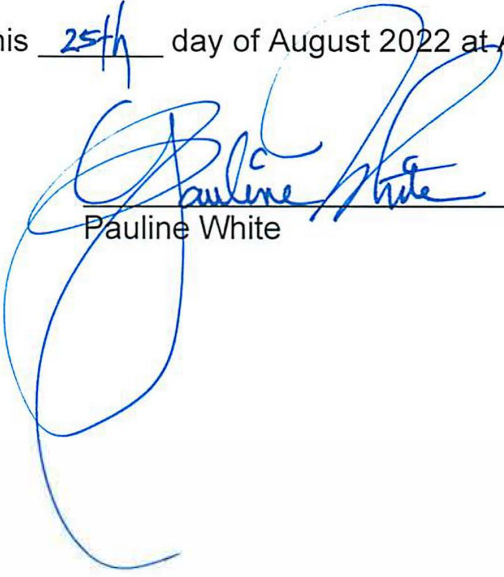
23 2017 VW Jetta

24 OR

25 (2) Alternatively, ORDER the Trustee to identify any attorney and/or law firm who is  
26 handling any claim/case associated with the above wrecked vehicles, so that RYC can contact  
27  
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1 the attorney or firm to see if storage is still required and to send storage bills to that person or  
2 law firm.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct. Executed this 25th day of August 2022 at Arcadia,  
5 California.  
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Pauline White  
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# **EXHIBIT “A”**

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**Pauline White**

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**From:** Pauline White  
**Sent:** Friday, March 26, 2021 4:37 PM  
**To:** emiller@sulmeyerlaw.com; lekval@swelawfirm.com  
**Cc:** Pauline White  
**Subject:** Bankruptcy Girardi Keese 2:20-bk-21022-BR  
**Attachments:** ltr to BK trustee GK 3-26-21.pdf

Ms. Miller,

Please see attached letter.  
pauline

**LAW OFFICES OF PAULINE WHITE**  
**150 North Santa Anita Avenue, Suite 300**  
**Arcadia, California 91006**

**626/821-1844**

**626/821-1849**

March 26, 2021

Elissa D. Miller  
333 South Grand Avenue, Ste. 3400  
Los Angeles, CA 90071-1406  
[emiller@sulmeyerlaw.com](mailto:emiller@sulmeyerlaw.com)

Smiley Wang-Ekvall, LLP  
Lei Lei Wang Ekvall  
3200 Park Center Drive, Ste. 250  
Costa Mesa, CA 92626  
[lekvall@swelawfirm.com](mailto:lekvall@swelawfirm.com)

Re: In Re Girardi Keese  
Bankruptcy Case: 2:20-bk-21022-BR

Dear Ms. Miller:

This follows the message I left for you yesterday. I represent Rest Your Case Evidence Storage LLC. This is a facility which stores and preserves vehicles/products which have been involved in incidents for which claims have been made or which are being litigated. We have an area where experts can examine these items. Girardi Keese has been a long-time client.

Rest Your Case Evidence Storage LLC will need to be added to the creditor list. Please advise if you need any particular form submitted for the Court in order that Rest Your Case Evidence Storage LLC may join as a creditor. My client is currently owed \$41,477.00, which increases monthly.

Of greater concern is that my client is holding wrecked vehicles/products which may, or may not, be essential to pending cases. Given the implosion of the Girardi Keese firm, we have no idea of the status of any case or which attorney/firm is handling any case. We do not have full case or party names, or venue, so that it is impossible for me to look up any litigated case.

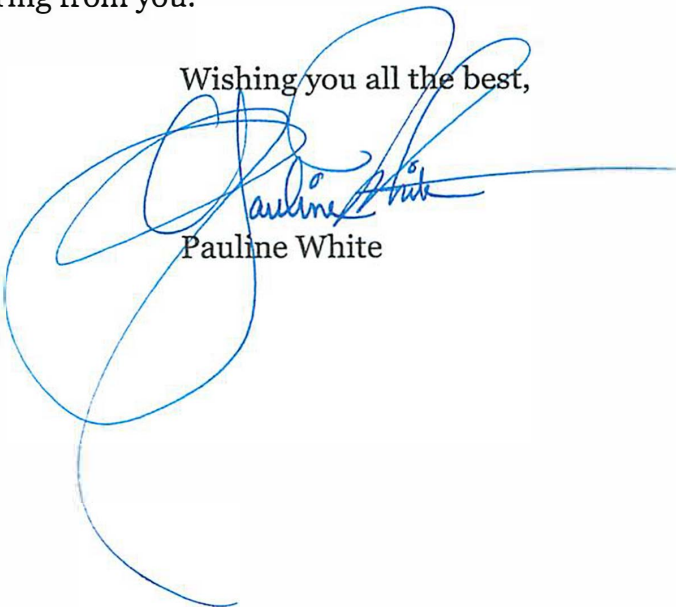
Page 2

All the information about each stored vehicle/product that we have is on the attached spreadsheet.

Please let us know if any of these cases are still open and if so, who the handling attorney is. We can contact the attorney to see if the vehicle/product is still needed. If the case has settled, we will dispose of the vehicle/product. If the case is still on-going and the item is still needed, perhaps the "new" attorney can enter into a contract regarding storage.

I look forward to hearing from you.

Wishing you all the best,



Pauline White

Enclosure:  
spread sheet of items stored

March 8, 2021

RYC#	Evidence	Case Name	Balance	Billed
11-0425	2006 Ford E350 Tour Bus	Chen, et al. v. TBE International, et al (2014194)	\$4,402.00	F/A
15-0201	2002 Ford Mustang	Andrews v. Albert	\$3,780.00	to 4/4/21
17-0417	2006 Toyota Corolla	Kelada v. Caltrans	\$4,400.00	to 5/27/21
17-1009	2001 KIA Sedona	Madero (2014134)	\$4,725.00	to 6/20/21
18-0329	2015 MB S550	Gabriel Abikzer v. City of LA (2017213)	\$5,534.00	to 6/10/20
18-0427	2013 Ford Taurus	James Martin Mc Daniels	\$4,050.00	to 4/14/21
18-0503	Pool & Ladder	Biglari v Amazon	\$1,145.00	F/A
18-1020	2017 VW Jetta	Jianna Bonomi	\$3,510.00	to 4/8/21
19-0201	2000 Audi A4	Lee v. Audi (2018272)	\$3,001.00	F/A
19-0524	1992 Ford Bus	Hernandez v Puga	\$6,930.00	to 5/22/2021

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Attorney for Creditor, Rest Your Case Evidence Storage LLC

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA—LOS ANGELES DIVISION

In re: Girardi Keese,  
Debtor

CASE NO.: 2:20-bk-21022-BR  
Assigned to: Hon. Barry Russell  
Dept. 1668

Declaration of Dave Galassi In Support Of  
Motion to Allow Disposition of Stored  
Wrecked Vehicles OR Identity of Attorney or  
Firm Handling Associated Case

Petition filed: 12-18-20

I, Dave Galassi, declare:

I make this declaration based on my own personal knowledge.

**About Rest Your Case:**

I am the managing member of Rest Your Case Evidence Storage LLC, ("RYC").

RYC stores items which someone considers significant for purposes of making claims,  
and/or litigation. Mostly, items stored are vehicles, but RYC stores any kind of item including  
computers, building materials, appliances, etc.

1 Manufacturers, Insurance companies, and both plaintiff and defense attorneys store  
2 items with RYC.

3 RYC provides warehouse space for stored items, along with a room for inspections with  
4 experts. RYC's client authorizes who can see the stored evidence, and many times will set an  
5 inspection, inviting designated people to view the evidence. RYC may have to lift vehicles by  
6 forklift for viewing of undercarriages. The client authorizes what is to be done with evidence;  
7 for example, RYC has delivered vehicles to racetracks for testing, then returned them to RYC;  
8 or delivered computers to the court, etc.

10 Almost every law firm involved in litigation has stored evidence at one time or another  
11 with RYC. As have insurance companies. And manufacturers.

13 When a client calls RYC they direct RYC to pick up a particular piece of evidence, on a  
14 certain day, and store it. Often RYC has to go to tow yards, and front payment of storage fees  
15 for release of a vehicle. The vehicles may have to be wrapped before transport to keep all  
16 pieces together and often must be loaded by forklift onto a flatbed.

17 When RYC is requested to store an item, the accident/incident may have just occurred.  
18 Sometimes a law firm has an expert come to RYC to examine a piece of evidence before  
19 deciding whether to even make a claim, or pursue a lawsuit, and after such an inspection the  
20 piece of evidence is disposed of in a short time period. Many times, there may be only a claim,  
21 which may not have ripened into a lawsuit, but attorneys and experts come for inspections. Or  
22 there is a lawsuit and inspections are obtained through the discovery process.

24 Thus, in most instances, RYC does not have party names, as are used in lawsuits.  
25 Even if there is a case name, RYC is not provided the Court location (state or fed, which  
26 county) or case number. Sometimes the "case name" when a lawsuit is filed is different than  
27 the case name given RYC, as a different defendant, or plaintiff, may be listed first in the  
28

caption on pleadings if there are multiple parties. The client does not always give RYC identities of involved parties or attorneys or adjusters, does not give RYC court information, claim information, does not give RYC police reports, etc. . Girardi Keese handled cases all over California and all over the United States. Thus, RYC identities evidence by make and model and client name. For example: "Girardi Keese, 2017 VW Jetta".

RYC does not know who the "owner" or title holder of any item is; relying on the direction of the client who contacts RYC.

RYC does not release stored evidence until receiving a written directive from the client who requested the storage.

RYC bills a client for storage every 90 days, until a client requests termination of storage and directs RYC as to what is to happen with the stored evidence. If a bill is unpaid, RYC contacts the client by telephone and email to remind them payment is due.

RYC is usually not told, and it does not matter to RYC, what the issue involving any particular piece of evidence is.

RYC has no information about WHY the five wrecked vehicles placed by Girardi Keese were stored.

**Girardi Keese Was a Client and Four Wrecked Vehicles Are Still Stored at RYC:**

RYC has never had a client go through bankruptcy before.

As RYC has not been paid for storage by Girardi Keese, RYC has filed a claim, as a creditor in the Girardi Keese bankruptcy of approximately \$50,000.00.

The Girardi Keese law firm stored multiple items at RYC.

The Girardi Keese firm appears to have been in disarray before the bankruptcy was filed as RYC's bills were not being paid, and RYC could not connect with anyone at Girardi



1 Keese who could answer when RYC's bills would be paid. RYC was never told whether any  
2 claim or case involving any stored evidence was still active or had settled, or if a different  
3 attorney or law firm was now substituted or associated in.

4 Once the bankruptcy for Girardi Keese was filed, RYC had no one to contact at Girardi  
5 Keese about the stored evidence. Thus, RYC has no way to: (a) determine if any evidence  
6 stored at RYC is still needed; or (b) if another attorney or law firm has taken over the  
7 claim/case involving the stored evidence.  
8

9 I meet many attorneys almost daily when they come for inspections or contact me for  
10 storage. I have sought to learn if they know whether any attorney or law firm has taken over  
11 handling of any claim involving a particular piece of evidence that Girardi Keese stored. I have  
12 had some success in identifying new counsel for some stored evidence. Likewise, some  
13 attorneys have called me to say they are now handling a claim involving a particular piece of  
14 evidence Girardi Keese stored.  
15

16 However, as to the four wrecked vehicles listed here, I have been unable to determine if  
17 any claim or case is still being pursued, and if pursued which attorney or law firm is handling  
18 such claim or case.  
19

20  
21 **Value of Stored Vehicles:**

22 All four remaining wrecked vehicles placed by Girardi Keese at RYC are damaged to  
23 the extent that they could not be repaired and made road worthy.  
24

25 If given permission to dispose of these vehicles, RYC would sell them for scrap metal.

26 The value of each vehicle as scrap metal is dependent on its weight, and metal prices  
27 fluctuate. However, in general, a wrecked vehicle brings approximately \$150.00 when sold for  
28 scrap. I estimate the total amount of salvage RYC could obtain from sale of these four

vehicles to be less than \$1,000.00. RYC could apply any salvage money received toward past due storage, since the amount to be received is so minimal.

The only real "value" these four wrecked vehicles have is either to prove, or disprove, some element of a claim or litigation. Since litigation can result in big awards, any attorney or law firm handling cases associated with these vehicles may highly value them.

**Remaining Evidence Placed by Girardi Keese at RYC:**

<b>RYC File #</b>	<b>Description</b>	<b>Case/ Claim</b>
17-0417	2006 Toyota Corolla	Kelada v. Caltrans
17-1009	2001 Kia Sedona	Madero
18-0329	2015 MB S550	Gabriel Abikzer v. City of LA
18-1020	2017 VW Jetta	Jianna Bonomi

**Prejudice to RYC:**

For safety, RYC's storage facility is limited in capacity of stored items. The stored items placed by Girardi Keese are taking away space RYC could use to store items for other customers. RYC has not been paid for storage of Girardi Keese evidence.

**Requested Relief:**

On behalf of RYC, I ask this Court to relieve RYC from this financial and space dilemma, by either:

(1) Issuing an order that RYC may dispose of these four wrecked vehicles and keep the salvage proceeds to offset storage fees, in order to free up space RYC could use to store items for other customers which will earn income: OR

(2) If the case/claim associated with any of these four wrecked vehicles is now being handled by an attorney/law firm, identify the attorney or law firm to RYC, so that RYC can contact them to determine if the wrecked vehicle still needs to be stored and RYC can send past due and current bills to such attorney or law firm.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 19 day of August 2022 at Irwindale, California.



Dave Galassi, Managing Member of Rest  
Your Case Evidence Storage LLC

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Attorney for Creditor, Rest Your Case Evidence Storage LLC

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA—LOS ANGELES DIVISION

In re: Girardi Keese,  
Debtor

CASE NO.: 2:20-bk-21022-BR  
Assigned to: Hon. Barry Russell  
Dept. 1668

[Proposed] ORDER on Motion to ORDER  
Disposition of Stored Wrecked Vehicles Sold  
for Scrap With RYC Keeping the Minimal  
Proceeds Therefrom OR To Order Trustee to  
Identify Any Attorney/Law Firm Handling The  
Cases Associated With the Vehicles;  
Memorandum of Points and Authorities;  
Declaration of Pauline White; Declaration of  
Dave Galassi

Petition filed: 12-18-20  
Date: September 27, 2022  
Time: 10:00 a.m.

This Court, having considered the moving papers, any opposition if any was submitted,  
or ruling without opposition having been made, finds Good Cause for the Relief Requested and  
now ORDERS:

1. The four (4) wrecked vehicles stored by Girardi Keese at Rest Your Case Evidence  
Storage LLC, consisting of a 2006 Toyota Corolla, 2001 Kia Sedona, 2015 MB  
S550, and a 2017 VW Jetta shall be declared to be exempt from any automatic stay,

not property of the bankruptcy estate, or linked to any case or claim handled by Girardi Keese and therefore Rest Your Case Evidence Storage LLC may proceed with any actions necessary to dispose of and sell these wrecked vehicles. Since the value of these wrecked vehicles is de minimus metal scrap value only, Rest Your Case Evidence Storage LLC may keep any scrap or salvage value from the sale of these vehicles and apply it toward storage fees owed by Girardi Keese.

OR

2. The Trustee and/or her law firm, are ORDERED, **forthwith**, to notify, in writing, counsel for Rest Your Case Evidence Storage LLC the names and addresses of any attorney or law firm handling the claim or case associated with any of these vehicles: 2006 Toyota Corolla, 2001 Kia Sedona, 2015 MB S550, and a 2017 VW Jetta.

If counsel for Rest Your Case Evidence Storage LLC is not informed of any attorney or law firm handling the claim or case associated with these vehicles within ten (10) days of the date this ORDER was signed, then Rest Your Case Evidence Storage LLC may proceed with any actions necessary to dispose of and sell these wrecked vehicles. Rest Your Case Evidence Storage LLC may keep any scrap or salvage value from the sale of these vehicles and apply it toward storage fees owed by Girardi Keese.

OR

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Barry Russell

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 150 N. Santa Anita Avenue, Suite 300, Arcadia, CA 91006. A true and correct copy of the foregoing document entitled: NOTICE OF MOTION AND MOTION For Disposition of Stored Wrecked Vehicles (with supporting declarations) and Proposed Order will be served or was served: (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document.

2. On 8-25-22, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:  
Service information continued on attached pages.

3. SERVED BY UNITED STATES MAIL: On 8-25-22, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. See attached.

4. Listing the judge here constitutes a declaration that delivery to the judge will be completed no later than 24 hours after the document is filed.

5. . SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows.

The Honorable Barry Russell  
U.S. Bankruptcy Court  
Roybal Federal Building  
255 E. Temple Street, Suite 1660  
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States that the foregoing is true  
and correct.

Date 8-25-22

Printed Name: Pauline White

Signature:  \_\_\_\_\_

SERVICE LIST

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Daniel M Hefner  
1902 HKY Blvd Apt E2 SW  
Lenior, NC 28645

**Creditor:** (40926798)  
Zachary Hook  
806 S Church St  
Albany, IL 61230

**Creditor:** (40983966)  
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P.O. Box 2047  
Statesboro, Georgia 30459  
Statesboro, GA 30459

**Creditor:** (40929881)  
David M Goodrich Ch 7 Tr for the  
Est of Michael & Josefina Hernandez  
c/o David M Goodrich  
650 Town Center Dr Ste 600  
Costa Mesa CA 92626

**Creditor:** (40950697)  
David Navarro  
210 S 14th St  
Las Vegas, NV 89101

**Creditor:** (40933780)  
Melvin Rosebud  
2904 Roadrunner Ct  
Highland, CA 92346

**Creditor:** (40952671)  
File And Servexpress Llc  
Po Box 679058  
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**Creditor:** (40935647)  
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10050 SW 122nd Ct  
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Miami, FL 33186

**Creditor:** (40962217)  
Queen Medley  
3506 Richmond Ave  
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**Creditor:** (40974081)  
Holstein, Taylor and Unitt  
6185 Magnolia Avenue, PMB 40  
Riverside, CA 92506-2524

**Creditor:** (40990087)  
Bernard Fernandez  
26439 Ovid Ave  
Lomita, CA 90717

**Creditor:** (40977309)  
Steiner & Libo, Professional Corporation  
11845 W Olympic Blvd, Suite 910W  
Los Angeles, CA 90064

**Creditor:** (40949389)  
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**Creditor:** (40959707)  
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2250 Stone Wheel Dr Apt B  
Reston, VA 20191

**Creditor:** (40946755)  
Andreta Mcelrath  
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Suwanee, GA 30024

**Creditor:** (40977919)  
City of Torrance  
c/o Jeffrey M. Soll  
Goldman, Magdalin & Krikes  
6300 Canoga Ave., Suite 1400  
Woodland Hills, CA 91367

**Creditor:** (40991454)  
Michael J Alleyne  
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Neptune, NJ 07753

**Creditor:** (40977920)  
Robert Yrigoyen  
474 S. Hidden Island Ln  
Coeur d'Alene, ID 83814

**Creditor:** (40993081)  
Billy R Brewer  
11669 Herrick Ave  
San Fernando, CA 91340

**Creditor:** (40977921)  
Jones, Roach & Caringella, Inc.  
c/o Stephen Roach  
10920 Via Frontera, Suite 440  
San Diego, CA 92127

**Creditor:** (40994387)  
Life Insurance Company of North America  
c/o Lisa Durrenberger  
51 Madison Avenue  
New York, NY 10010

**Creditor:** (40994605)  
Sheila M Marshall  
1606 W 83rd St  
Los Angeles, CA 90047

**Creditor:** (40995434)  
Huntley-Fenner Advisors, Inc.  
5319 University Drive, #137  
Irvine, CA 92612

**Creditor:** (40996025)  
System Supply Stationery  
1251 E. Walnut Street  
Carson, CA 90746

**Creditor:** (40956205)  
Johnny Thompson  
P.O. Box 1613  
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**Creditor:** (40957427)  
Kusar Legal Services, Inc.  
3780 Kilroy Airport Way  
Suite 300  
Long Beach, CA 90806

**Creditor:** (40956241)  
Jonathan Club  
Accounting Dept  
545 S Figueroa St  
Los Angeles, CA 90071-1795

**Creditor:** (40958522)  
LOS ANGELES COUNTY TREASURER  
AND TAX COLLECTOR  
ATTN: BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

**Creditor:** (40953334)  
Georgina Butler  
Heirs of Gwendalena Butler  
3348 Beatrice Dr  
Riverside, CA 92509

**Creditor:** (40963599)  
Ronald James Butler  
Heirs of Gwendalena Butler  
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**Creditor:** (40957673)  
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East Cleveland, OH 44112

**Creditor:** (40999170)  
Keeya Joiner  
Daughter of Anthony L Joiner  
3348 Beatrice Dr  
Riverside, CA 92509

**Creditor:** (40995960)  
John W Kent  
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**Creditor:** (40999186)  
Thomas Woodcock  
Helen Woodcock  
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Valparaiso, FL 32580

**Creditor:** (40956596)  
Juanita Harris  
1606 W 83rd St  
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**Creditor:** (40961233)  
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Pacoima, CA 91331

**Creditor:** (40999190)  
Vivian C Hampton  
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**Creditor:** (40999191)  
Kay Smith  
Richard North  
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Pasadena, CA 91103

**Creditor:** (40999192)  
Precise Professional Services  
Samuel Dulin  
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Lancaster, CA 93534

**Creditor:** (40999193)  
Edith Mae Strong  
253 West Howard  
Pasadena, CA 91103

**Creditor:** (40999202)  
Ray Butler  
3348 Beatrice Dr  
Riverside, CA 92509

**Creditor:** (40999203)  
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Valinda, CA 91744

**Creditor:** (40958364)  
Lizzie Mae Hill  
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Los Angeles, CA 90044

**Creditor:** (41007057)  
CJ Hill  
28105 Orangegrove Ave  
Menifee, CA 92584

**Creditor:** (40960701)  
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3048 Almond St  
Philadelphia, PA 19134

**Creditor:** (40957673)  
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14113 Northfield Ave  
East Cleveland, OH 44112

**Creditor:** (40949362)  
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**Creditor:** (40950594)  
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**Creditor:** (41035653)  
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38632 brookside ave  
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**Creditor:** (41037850)  
4477 Ruby Rd  
Fayetteville, NC 28311

**Creditor:** (40962201)  
Q F  
Jacqueline Mccluskey  
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**Creditor:** (41042487)  
MDA Financial Solutions  
Devin Sawdayi A Law Corporation  
10866 Wilshire Blvd Ste 890  
Los Angeles CA 90024

**Creditor:** (41042475)  
Rajan M Patel MD  
Devin Sawdayi A Law Corporation  
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**Creditor:** (40956240)  
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**Creditor:** (41042833)  
RPC Property Tax Advisors LLC  
PO Box 7289  
San Diego CA 92167

**Creditor:** (41043849)  
FedEx Corporate Services, Inc  
3965 Airways Blvd, Module G, 3rd Floor  
Memphis, TN 38116-5017

**Creditor:** (41044466)  
Ronnie M. Williams  
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91741

**Creditor:** (41046305)  
Department of Health Care Services  
P.O. Box 997413, MS 0010  
Sacramento, CA 95899

**Creditor:** (41049264)  
INTERNAL REVENUE SERVICE  
ATTN. INSOLVENCY  
300 N LOS ANGELES ST MS 5022  
LOS ANGELES, CA 90012

**Creditor:** (41070413)  
Bulkley, Richardson and Gelinas, LLP  
1500 Main Street  
Suite 2700  
Springfield, MA 01115

**Creditor:** (41070839)  
Regina Torrez  
24503 PANAMA AVENUE  
CARSON, CA 90745

**Creditor:** (41070847)  
Armando Torrez  
24503 Panama Avenue  
CARSON, CA 90745

**Creditor:** (41070860)  
Bryan Zachary Torrez  
24503 Panama Avenue  
CARSON, CA 90745

**Creditor:** (41070881)  
Jake Alexander Torrez  
24503 Panama Avenue  
Carson, CA 90745

**Creditor:** (41070903)  
Christopher Torrez  
24503 Panama Avenue  
CARSON, CA 90745

**Creditor:** (41071075)  
JAMES DEVITT  
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**Creditor:** (40946280)  
Alejandro Martinez  
24410 Panama Ave  
Carson, CA 90745

**Creditor:** (40946280)  
Alejandro Martinez  
24410 Panama Ave  
Carson, CA 90745

**Creditor:** (40962454)  
Ramona Martinez  
24410 Panama Ave  
Carson, CA 90745

**Creditor:** (40946996)  
Anthony Martinez  
24410 Panama Ave  
Carson, CA 90745

**Creditor:** (40946297)  
Alex Martinez  
24410 Panama Ave  
Carson, CA 90745

**Creditor:** (40961814)  
Pete Rodriguez  
24406 Panama Ave  
San Pedro, CA 90732

**Creditor:** (40955587)  
Jenny Rodriguez  
24406 Panama Ave  
Carson, CA 90745

**Creditor:** (40961814)  
Pete Rodriguez  
24406 Panama Ave  
San Pedro, CA 90732

**Creditor:** (41071557)  
Abir Cohen Treyzon Salo, LLP  
c/o Daniel J McCarthy  
300 S Grand Ave. 37th Fl  
Los Angeles, CA 90071

**Creditor:** (41071844)  
1126 Wilshire Partnership  
c/o Daniel J McCarthy  
300 S Grand Ave 37th Fl  
Los Angeles, CA 90071

**Creditor:** (41071845)  
Robert W Finnerty  
c/o Daniel J McCarthy  
300 S Grand Ave 37th Fl  
Los Angeles, CA 90071

**Creditor:** (41072166)  
Cintas Corporation  
Ronald E. Gold, Frost Brown Todd LLC  
3300 Great American Tower  
301 East Fourth St.  
Cincinnati, OH 45202

**Creditor:** (41073147)  
Erika Girardi  
c/o Evan C. Borges  
GREENBERG GROSS LLP  
650 Town Center Drive, Suite 1700  
Costa Mesa, CA 92626

**Creditor:** (41122259)  
Brittany Farag  
Lopez (Maiden Name)  
24416 Neptune Ave  
Carson, CA 90745

**Creditor:** (40948274)  
Brian Goldstein  
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**Creditor:** (41122260)  
Dawn Scott Disability Trust  
Dawn Scott  
1437 N Denver Ave #234  
Loveland, CO 80538

**Creditor:** (40956596)  
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Los Angeles, CA 90047

**Creditor:** (40947962)  
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7117 Nebraska St  
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**Creditor:** (41122261)  
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**Creditor:** (41122262)  
Joyce Smith  
Joyce Smith/Deceased  
2066 Evergreen St  
Irvine, CA 91750

**Creditor:** (40960701)  
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Philadelphia, PA 19134

**Creditor:** (41122266)  
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**Creditor:** (41122264)  
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**Creditor:** (40949811)  
Commercial Truck Consulting Llc  
240 Ne Scenic Dr  
Grants Pass, OR 97526

**Creditor:** (40959113)  
Maria Martinez  
24810 Petaluma Ln  
Carson, CA 90745

**Creditor:** (40952017)  
Elite Court Reporting  
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Ste 105  
Rancho Santa Margarita, CA 92688

**Creditor:** (40966442)  
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Riley Uslan  
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Lake Balboa, CA 91406

**Creditor:** (41122276)  
Shane M Wilson  
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**Creditor:** (41122275)  
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669 NW Byers Ln  
Dallas, OR 97338

**Creditor:** (41122278)  
Jaclyn Caballero  
4495 Mount Vernon Avenue  
Riverside, CA 92507

**Creditor:** (40845606)  
Jehoshaphat Shambee  
Linda Shambee on behalf of Jehosphat  
Sha  
721 Karey Drive  
Temple TX 76502

**Creditor:** (41122280)  
Veritext LLC  
Philip Landsman  
Law Offices of Philip Landsman  
5776 Lindero Canyon Rd Suite D666  
Westlake Village, CA 91362

**Creditor:** (40951473)  
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Loni Baldwin  
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Elkhart, IN 46514

**Creditor:** (41122283)  
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**Creditor:** (40967061)  
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Carson, CA 90746

**Creditor:** (40947418)  
Axia Advisors Llc  
1743 Golden Gate Ave  
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San Francisco, CA 94115

**Creditor:** (40950016)  
Courtney Beans  
468 Post Ave  
Rochester, NY 14619

**Creditor:** (40960050)  
Michael Brown  
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Washington Township, OH 45458

**Creditor:** (41122290)  
WeatherExtreme Ltd  
Elizabeth Austin  
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Incline Village, NV 89451

**Creditor:** (40849082)  
John Edward Tillson IV  
W179S6562 Hardtke Drive  
Muskego, WI 53150

**Creditor:** (40830588)  
Golkow Litigation Services, LLC  
Golkow Litigation Services  
1650 Market Street, Suite 5150  
Philadelphia, PA 19103

**Creditor:** (40963655)  
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**Creditor:** (41122294)  
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**Creditor:** (40950375)  
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**Creditor:** (40966533)  
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Joseph C Wu Md  
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Irvine, CA 92612-2621

**Creditor:** (40950797)  
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11 Walton Herndon Dr  
Mecherren, VA 23954

**Creditor:** (40963813)  
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**Creditor:** (40951182)  
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**Creditor:** (40959707)  
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**Creditor:** (41122299)  
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**Creditor:** (40966348)  
Trent And Suzanne Boling And Family  
295 Brookside Terrace  
Tonawanda, NY 14150

**Creditor:** (40963761)  
Roshanak Mirtorabi  
28961 Timberlane St  
Agoura Hills, CA 91301

**Creditor:** (40957680)  
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1518 Hemmer Lane Apt O  
Mishawaka, IN 46545

**Creditor:** (40951741)  
Earl Richard Sr  
326 19th Ave  
Vero Beach, FL 32962

**Creditor:** (41122301)  
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805 Lapsley St  
Selma, AL 36701

**Creditor:** (40947378)  
Ausino Lavan  
2500 E Wallisville Rd #57  
Highlands, TX 77562

**Creditor:** (40966107)  
Thrifty R And A Communications  
d/b/a Trac Communication  
Dennis Havelsen  
396 Patrician Way  
Pasadena, CA 91105-1028

**Creditor:** (41122302)  
Brenda Lee Scurlock  
289 Clarrington Court  
Lumber Bridge, NC 28357

**Creditor:** (40999190)  
Vivian C Hampton  
PO Box 90396  
Pasadena, CA 91109

**Creditor:** (41122304)  
Stephanie Brown (Ardoin)  
Kelvin Brown

8203 Lawler St  
Houston, TX 77051-1311

**Creditor:** (40947776)  
Berkeley Engineering And Research Inc  
808 Gilman St  
Berkeley, CA 94710-2217

**Creditor:** (40951188)  
Diego Anaya's widow Lupe Anaya  
Po Box 21753  
Albuquerque, NM 87154

**Creditor:** (40947571)  
Barbara Lowe  
12219 Terra Bella  
Pacoima, CA 91331

**Creditor:** (41122308)  
Michelle Connell for Sandi DeHaan  
Deceased  
14585 Stallion Trail  
Victorville, CA 92392

**Creditor:** (40952266)  
Eric Lindvall DO  
Dept Of Orthopaedic Surgery  
Andrew Ranta  
155 N Fresno St  
Fresno, CA 93701

**Creditor:** (40950584)  
David Brady Pregerson Md Inc  
4062 Karst Rd  
Carlsbad, CA 92010

**Creditor:** (40991454)  
Michael J Alleyne  
29 Heath Dr  
Neptune, NJ 07753

**Creditor:** (41122313)  
Gera Dean Williams  
1425 Washington Village Parkway, Apt  
211  
Beaumont, TX 77707

**Creditor:** (41122333)  
Maggie Lee Lambert

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**Creditor:** (40960906)  
Nickalas Maurice Wilson  
Mary Daniel Wilson  
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Sanford, SC 27332

**Creditor:** (40959260)  
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**Creditor:** (40962221)  
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6208 Timber Ridge Dr  
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**Creditor:** (40947253)  
Arturo O Lopez  
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Paramount, CA 90723

**Creditor:** (40957051)  
Keith E Vinneccour CPO (E)  
7329 Easthaven Ln  
West Hills, CA 91307

**Creditor:** (40946951)  
Annie Ward Williams  
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Atlanta, GA 30316

**Creditor:** (40961044)  
Norman Clayton Welch  
182 Cooper St Apt 2  
Brooklyn, NY 11207

**Creditor:** (40946046)  
Adam Luna  
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**Creditor:** (40994605)  
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Los Angeles, CA 90047

**Creditor:** (41122342)  
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1407 W Shamrock  
Rialto, CA 92376

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920 Glenwood St Ne  
Warren, OH 44483

**Creditor:** (40952672)  
File Keepers Llc  
6277 East Slauson Ave  
Los Angeles, CA 90040

**Creditor:** (40995960)  
John W Kent  
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**Creditor:** (40963599)  
Ronald James Butler  
Heirs of Gwendalena Butler  
10521 Gusty Ct  
Las Vegas, NV 89129

**Creditor:** (40965967)  
Theresa Strickland  
191 Pace Creek Rd  
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**Creditor:** (40950181)  
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5730 Lotus St  
Riverside, CA 92509

**Creditor:** (41122345)  
Gisele Thompson-Fry  
On behalf of Cody Thompson  
12040 Driftstone Dr  
Fishers, IN 46037

**Creditor:** (40966120)  
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12 Sims Ln  
Hatchechubbee, AL 36858

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**Creditor:** (40959775)  
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**Creditor:** (41122347)  
Kathe G Jones  
223 Glenn Rd  
West Columbia, SC 29172

**Creditor:** (40841018)  
Ronnell Taylor on the behalf of Sadie  
Taylor  
114 Racquet Club Dr #608  
Greensburg, PA 15601

**Creditor:** (41122350)  
Joseph Clayvon McAfee Jr  
11532 Greene Ct  
Adelanto, CA 92301

**Creditor:** (40950792)  
Dawn Scott Disability Trust  
Dawn Scott  
301 E Harmony Rd #306  
Ft Collins, CO 80525

**Creditor:** (40962432)  
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675 Brookside Ct  
Mountain Home, ID 83647

**Creditor:** (40949596)  
Cityscape Inc  
229 27th Street  
Manhattan Beach, CA 90266

**Creditor:** (40956199)  
Johnny Moody (Deceased)  
Leona Moody  
11183 S Manhattan Place  
Los Angeles, CA 90047

**Creditor:** (40964525)  
Sharla Taylor  
2075 Carpenter Ln  
Redding, CA 96002

**Creditor:** (40946242)  
Albert Kemper  
9265 Burton Way 302  
Beverly Hills, CA 90210

**Creditor:** (41122358)  
Eun Sun Greer  
2 Soaring hawk  
Irvine, CA 92614

**Creditor:** (40956337)  
Jose Lopez  
24416 Neptune Ave  
Carson, CA 90745

**Creditor:** (40948952)  
Catherine Lopez  
24416 Neptune Ave  
Carson, CA 90745

**Creditor:** (40951449)  
Doris Jamerson  
259 Monterey Dr  
Carson, CA 90745

**Creditor:** (40957369)  
Kory Jamerson  
259 Monterey Dr  
Carson, CA 90745

**Creditor:** (40964812)  
Sol Jamerson  
259 Monterey Dr  
Carson, CA 90745

**Creditor:** (40957392)  
Kristol Evans  
102 Sugarhill Dr  
Zebulon, NC 27597

**Creditor:** (40965398)  
Suzanne Grube  
9 Pine Grove Ln  
Hockessin, DE 19707

**Creditor:** (40949465)  
Chrystina Monique Lopez  
24416 Neptune Ave  
Carson, CA 90745

**Creditor:** (40964430)  
Sedegh Samadian  
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Pleasant Hill, CA 94523

**Creditor:** (40963313)  
Robert Manick  
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Los Angeles, CA 90047

**Creditor:** (40908363)  
Crystal Fisher  
PO Box 4228  
Bethlehem, PA 18018

**Creditor:** (41123556)  
Antonia Padilla, Mother and  
Guardian of EQ a minor  
9128 Burke St #327  
Pico Rivera, CA 90660

**Creditor:** (40959895)  
Melchor Amezcua  
On Behalf of Marciano Amezcua  
455 E 247th St  
Carson, CA 90745

**Creditor:** (41125096)  
Melchor Amezcua On Behalf of  
Maria Elena Amezcua  
455 E 247th St  
Carson, CA 90745

**Creditor:** (40958364)  
Lizzie Mae Hill  
627 W 92nd St  
Los Angeles, CA 90044

**Creditor:** (40961199)  
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Carson, CA 90745

**Creditor:** (40966965)  
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Riverside, CA 92509

**Creditor:** (40963664)  
Ronnie Patterson  
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Manchester, TN 37355

**Creditor:** (41123566)  
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5461 Yarmouth Ave #6  
Encino, CA 91316

**Creditor:** (40956100)  
John Pratt  
990 King Hill Rd  
Readsboro, VT 05350

**Creditor:** (40964967)  
Stacey Young  
173 Bowens Mill Hwy Apt 101  
Fitzgerald, GA 31750

**Creditor:** (40959764)  
Mazuma Capital Inc  
Db a Capital Logistics And Investigations  
22287 Mulholland Highway  
Ste 261  
Calabasas, CA 91302

**Creditor:** (40962976)  
Richard Perkins  
24719 Ravenna Ave  
Carson, CA 90745

**Creditor:** (40958691)  
Estate of Lynda Buxton  
25 Knox Ave  
West Seneca, NY 14224

**Creditor:** (40952810)  
Patricia Cruickshanks, Executor  
for Frances Cruickshanks  
3061 Montfort Loop  
Hemrico, VA 23294

**Creditor:** (40948770)  
Carmen Bollinger  
24719 Neptune Ave  
Carson, CA 90745

**Creditor:** (40933780)  
Melvin Rosebud  
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**Creditor:** (40946400)  
Alicia Perkins  
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**Creditor:** (40957704)  
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**Creditor:** (41123574)  
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Uvalde Tx

**Creditor:** (41123578)  
Mary D Davis  
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Peoria, IL 61604

**Creditor:** (40960194)  
Michael S Ritter Md Inc  
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**Creditor:** (41123581)  
Gladys Hernandez  
on behalf of Enrique Hernandez  
Trustee of Enrique Hernandez Trust  
18303 130th Avenue SE  
Renton, WA 98058

**Creditor:** (40947782)  
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**Creditor:** (40959815)  
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23281 Vista Grande Dr  
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**Creditor:** (41123584)  
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11371 Boone Way  
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**Creditor:** (41123585)  
Kenneth W. Gordon as Chapter 7 Trustee  
For Marc Flann  
625 Honeoye Falls Five Points Road  
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**Creditor:** (40958572)  
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Socorro Martinez  
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**Creditor:** (40952118)  
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Millard  
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**Creditor:** (41123641)  
Miguel Echevarria on behalf of  
Modesta Echevarria  
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**Creditor:** (41123648)  
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2727 S Averill Ave  
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**Creditor:** (40672018)  
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Redlands, CA 92373

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**Creditor:** (41123688)  
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Aliso Viejo, CA 92656

**Creditor:** (40954564)  
Integrated Resource Mgmt Inc  
405 North Indian Hill Blvd  
Claremont, CA 91711-4600

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Bobbie Butts-Dunn on behalf of A.B.  
(Deceased)

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**Creditor:** (41123692)  
Bobbie Butts-Dunn on behalf of W.B.  
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White, Darnell White, Kamora White  
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OBO Olga Hernandez  
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c/o Marvin E. Harvey Jr. (POA)  
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**Creditor:** (40946283)  
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**Creditor:** (40953555)  
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24509 Ravenna Ave  
Carson, CA 90745

**Creditor:** (41124134)  
Linda J Armstrong  
On behalf of Dessie D Mandosia  
1145 Chagal Avenue  
Lancaster CA 93535

**Creditor:** (41124169)  
Carolyn J Johnson  
1027 Glenn Court  
Lancaster CA 93535

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Main Document  
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*Creditor:* (40965321)  
Support Svc Engineering Corp  
Charles W Powell, PE  
3360 Allspice Run  
Norman, OK 73026-4540

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OBO Emogene Tolbert  
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*Creditor:* (40952591)  
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*Creditor:* (41124174)  
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On behalf of Dessie D Mandosia  
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Sylvia Brown Rumble  
Johnny Rumble, Deceased  
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Diana Marotta  
On behalf of Catherine Marotta  
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*Creditor:* (41124919)  
Harvey Vechery, Individually and as  
Trustee of The Vechery Family Trust  
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2923 Bradley St Ste 120  
Pasadena CA 91107

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10438 Coloma Rd 32  
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**Creditor:** (41125431)  
Betty Schlangen  
On behalf of Oscar George Schlangen  
25393 Cole St #212  
Loma Linda, CA 92354

**Creditor:** (40950715)  
David R Lira  
Engstrom Lipscomb & Lack  
10100 Santa Monica Blvd 12th Fl  
Los Angeles, CA 90067

**Creditor:** (40950912)  
Debra Starkey  
On behalf of William E Boyland  
46100 Verba Santa Dr  
Palm Desert, CA 92260

**Creditor:** (41125446)  
Candy Hortencia Torres  
6386 Choctaw Pl  
Rancho Cucamonga CA 91739

**Creditor:** (41126122)  
Paula Nilza Torres  
6386 Choctaw Place  
Rancho Cucamonga CA 91739

**Creditor:** (41126125)  
Candelaria Torres  
6386 Choctaw Place  
Rancho Cucamonga CA 91739

**Creditor:** (41126126)  
Jorge Torres  
6386 Choctaw Place  
Rancho Cucamonga CA 91739

**Creditor:** (40948912)  
Case Anywhere Llc  
21860 Burbank Blvd  
Ste 125  
Woodland Hills, CA 91367

**Creditor:** (40965629)  
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19037 Napa St  
Northridge, CA 91324

**Creditor:** (41126130)  
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Wilmington, CA 90744

**Creditor:** (41126145)  
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**Creditor:** (40947543)  
Barbara Dianne Keelin  
753 Cypress Ave  
Colton, CA 92324

**Creditor:** (40952696)  
First Legal Network Llc  
Po Box 743451  
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**Creditor:** (40953104)  
Gancedo And Nieves LLP  
1575 N Lake Avenue  
Ste 202  
Pasadena, CA 91103

**Creditor:** (40953252)  
Geokinetics  
77 Bunsen  
Irvine, CA 92618

**Creditor:** (41126361)  
Hooman Melamed MD  
Law Offices Of Matthew Mickelson  
16055 Ventura Blvd., Ste 1230  
Encino, CA 91436

**Creditor:** (41126362)  
Mildred Davis  
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2117 Benjamin Creek Dr  
Little Elm, TX 75068

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**Creditor:** (40955465)  
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24512 Fries Ave  
Carson, CA 90745

**Creditor:** (41126507)  
Jeff Frick Representative/Heir of Naomi  
Carter  
24512 Fries Ave  
Carson CA 90745

**Creditor:** (40839758)  
KCC Class Action Services, LLC  
c/o Drake Foster  
222 N Pacific Coast Highway, 3rd Floor  
El Segundo, CA 90245

**Creditor:** (40955627)  
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17513 S Keene Ave  
Carson, CA 90746

**Creditor:** (40960458)  
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40 Hitching Post Dr  
Rolling Hills Estate, CA 90274-5169



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17573 S Keene  
Carson, CA 90746

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40 Hitching Post Dr  
Rolling Hills Estate, CA 90274-5169

*Creditor:* (40946798)  
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17513 S Keene  
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Belen Vargas on behalf of  
Belen Guerrero Sanchez  
1704 Prince Albert Drive  
Riverside CA 92507

*Creditor:* (40958460)  
Loretta Joyce Fowler  
6328 Claridge Dr  
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*Creditor:* (40955393)  
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24532 Marbella Ave  
Carson, CA 90745

*Creditor:* (40960918)  
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24807 Island Ave  
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2839 S Robertson Blvd  
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*Creditor:* (40960432)  
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Thomas Vincent Girardi  
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*Creditor:* (41126684)  
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Blake C. Alsbrook, Receiver in Los Angeles  
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Beverly Hills, CA 90212

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Santa Monica CA 90403

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c/o Edwenra Jones  
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Moreno Valley, CA 92555

**Creditor:** (40966004)  
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26262 Shetland Ln  
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**Creditor:** (40959569)  
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**Creditor:** (40953273)  
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Riverside, CA 92509

**Creditor:** (40960611)  
Nadrich And Cohen  
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Carson, CA 90745

**Creditor:** (40956311)  
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24710 Marbella Ave  
Carson, CA 90745

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**Creditor:** (41128500)  
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**Creditor:** (41128504)  
Maria Russell  
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Colton CA 92324

**Creditor:** (41128506)  
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**Creditor:** (41128507)  
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Colton CA 92324

**Creditor:** (41128508)  
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Peter Clarke  
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**Creditor:** (40952487)  
Everest Court Reporting Llc  
12 Penns Trl  
Newtown, PA 18940

**Creditor:** (41128509)  
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**Creditor:** (40967630)  
A.S. a minor child  
Yaneth Barrientos  
5385 Bell Ave  
Riverside, CA 92509

**Creditor:** (41128512)  
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**Creditor:** (41128513)  
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**Creditor:** (41128514)  
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912 N Okmulgee Ave  
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**Creditor:** (41128523)  
Ann and David Stow  
Conservators of Bryan Michael Stow  
Tamar Terzian  
1122 E Green St  
Pasadena CA 91106

**Creditor:** (41128525)  
Jeri Juarez  
1203 S Berkley St  
Anaheim CA 92804

**Creditor:** (41128524)  
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**Creditor:** (41128526)  
Marlene Aquino  
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Pasadena CA 91106

**Creditor:** (41128527)  
Dr Anthony Heaney  
Tamar Terzian  
1122 East Green Street  
Suite 201  
Pasadena CA 91106

**Creditor:** (41128529)  
Erika Martinez for the Estate of  
A. M. a minor  
1757 Riverside Dr  
Glendale CA 91201

**Creditor:** (41128530)  
Eric Lindvall  
Tamar Terzian  
1122 E Green St  
Pasadena CA 91106

**Creditor:** (41128557)  
Michele Gathrid  
2720 Roscomare Road  
Los Angeles CA 90077

**Creditor:** (41128560)  
Wexco International LLC  
Tamar Terzian  
1122 E Green St  
Pasadena CA 91106

**Creditor:** (41128562)  
Andy Armstrong  
400 S California Street  
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**Creditor:** (41128571)  
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Tamar Terzian  
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**Creditor:** (41128572)  
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Brian Mintz  
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**Creditor:** (41128573)  
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1324 N Broadway  
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**Creditor:** (41128578)  
Translational Technologies International  
LLC  
April Zambelli-Weiner  
1231 Tech Ct Ste 201  
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Spartanburg, SC 29303

*Creditor:* (41128580)  
Cedar Sinai Medical Group  
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Mohamed Eltaher  
3319 5th South  
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*Creditor:* (41128582)  
HealthCare Partners  
Law Offices of Robert Yaspan  
21700 Oxnard St Ste 1750  
Woodland Hills CA 91367

*Creditor:* (41128584)  
Greater Newport Physicians  
Robert Yaspan  
21700 Oxnard St Ste 1750  
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*Creditor:* (41128585)  
Brian Mintz  
529 Melbourne Court  
Newbury Park CA 91320

*Creditor:* (41128584)  
Greater Newport Physicians  
Robert Yaspan  
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Woodland Hills CA 91367

*Creditor:* (40960314)  
Mike Vargas  
Araseli Vargas  
24517 Marbella Ave  
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*Creditor:* (41128591)  
Signal Funding LLC  
Marko Llich

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Dania Beach FL 33004

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James Ruigomez  
1861 Donner Ave  
San Bruno CA 94066

*Creditor:* (41128560)  
Wexco International LLC  
Tamar Terzian  
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Rosa Maria Leyva  
2754 Avalon St  
Riverside, CA 92509

*Creditor:* (40962828)  
Ricardo Ramirez Leyva  
2754 Avalon St  
Riverside, CA 92509

*Creditor:* (41128621)  
Diana Leyva  
2754 Avalon Street  
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*Creditor:* (41128624)  
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Lockbox #913074  
PO Box 31001  
Pasadena CA 91110

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64 Fitch Meadow Lane  
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*Creditor:* (41128650)  
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29900 Hawthorne Blvd  
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*Creditor:* (41128625)  
GRS Funding  
Lockbox #913074  
PO Box 31001  
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Lockbox #913074  
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2218 East Maple Ave  
El Segundo, CA 90245

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Citrus Heights CA 95610

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Lockbox #913074  
PO Box 31001  
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17262 Chapparal Lane  
Huntington Beach, CA 92649

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Dayton, OH 45420

**Creditor:** (41128669)  
JS Held LLC  
50 Jericho Quadrangle  
Suite 117  
Jericho NY 11753

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Frederick Charles Bryant  
13734 Rundell Dr  
Moreno Valley, CA 92553

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1378 W 26th Pl  
San Pedro, CA 90732

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24503 Marbella Ave  
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Randi Kassan  
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24503 S Marbella Ave  
Carson, CA 90745

**Creditor:** (40963782)  
Rosvel Chairez  
24503 Marbella Ave  
Carson, CA 90745

**Creditor:** (40950791)  
Dawn Pendleton  
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Fontana, CA 92337

**Creditor:** (41128739)  
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**Creditor:** (41128741)  
Jared Baptista  
Randi Kassan  
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Thompson Reuters - West  
Moss & Barnett  
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Clara Muhammed  
9225 Travita Cir  
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Roque De La Fuente  
Randi Kassan  
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2896 Avalon St  
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**Creditor:** (40965044)  
Steelgate Inc  
2307 58th Ave East  
Bradenton, FL 34203

**Creditor:** (41128782)  
Dylan Quinonez  
2896 Avalon St  
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**Creditor:** (40960689)  
Nashawn Garland (deceased)  
Monica Hardiman  
PO Box 916  
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**Creditor:** (41128803)  
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**Creditor:** (40961261)  
Oscar Casino  
1024 W Gian Dr  
Torrance, CA 90502

*Creditor:* (40959987)  
Merlita Casino  
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Christopher Gutierrez  
24423 Marbella Ave  
Carson, CA 90745

*Creditor:* (40952219)  
Enrique Ramirez  
24423 Marbella Ave  
Carson, CA 90745

*Creditor:* (40955705)  
Jessica Ramirez  
24423 Marbella Ave  
Carson, CA 90745

*Creditor:* (40947699)  
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24118 Ravenna Ave  
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12435 Rimrock Ln  
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*Creditor:* (41128845)  
Lorrie Bryant Hernandez  
James Alvin Bryant  
5235 W Wathen Ave  
Fresno CA 93722

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Ruth Cross  
Daughter of Lucille Jones  
2521 Aster St  
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Patricia L Gallow  
1923 Beau Blanc Drive  
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*Creditor:* (40952976)  
French Hand Laundry And Dry  
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606 South Lake Ave  
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PhilDarius Parrish  
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4073 Pine Valley Rd  
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1078 Debbie Rd  
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On Behalf of Raul Villa Olivas

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KARSYN DANIELS  
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Paglialunga And Harris PS  
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Edilberto Rubi General Painting Service  
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Girardi Keese  
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